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No. 80-5950

IN THE

Supreme Court of the United States

OCTOBER TERM, 1980

LAVERNE L. LOGAN,

Appellant,

v.

ZIMMERMAN BRUSH COMPANY,

Appellee.

On Appeal From The Illinois Supreme Court

REPLY BRIEF FOR APPELLANT

GARY H. PALM
MARK C. WEBER
EDWIN F. MANDEL LEGAL AID CLINIC
UNIVERSITY OF CHICAGO LAW SCHOOL
6020 South University Avenue
Chicago, Illinois 60637
(312) 324-5181
Attorneys for Appellant

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TABLE OF CONTENTS

	Page
TABLE OF AUTHORITIES	ii
ARGUMENT	1
I. The Procedures Of The Fair Employment Practices Act Deny Mr. Logan The Due Process Guaranteed By The Fourteenth Amendment	1
II. Mr. Logan's Action Under The FEPA Is A Property Interest Which Must Be Protected By Procedures Complying With Due Process Requirements	6
III. Dismissal Of Mr. Logan's Charge Because Of The Failure Of The Commission's Investigator To Convene A Timely Fact Finding Conference Is Wholly Arbitrary And Irrational, And Therefore Violates Due Process	10
IV. Termination Of Mr. Logan's Employment Discrimination Claim Violates Equal Protection	12
CONCLUSION	13

TABLE OF AUTHORITIES

CASES: Page

Armstrong v. *Manzo*, 380 U.S. 535 (1965) 4

Arnett v. *Kennedy*, 416 U.S. 134 (1974) 7, 8

Bell v. *Burson*, 402 U.S. 535 (1971) 8

Board of Regents v. *Roth*, 408 U.S. 564 (1972) 8

Bonner v. *Couglin*, 517 F.2d 1311 (7th Cir. 1975), *modified en banc*, 545 F.2d 565 (1976), *cert. denied*, 435 U.S. 932 (1978) 3

Ferri v. *Ackerman*, 444 U.S. 193 (1979) 10

Goldberg v. *Kelly*, 397 U.S. 254 (1970) 8

Kimbrough v. *O'Neil*, 523 F.2d 1057 (7th Cir. 1975), *aff'd en banc*, 545 F.2d 1059 (1976) 3

Lane v. *Brown*, 372 U.S. 477 (1963) 6

Lindsey v. *Normet*, 405 U.S. 56 (1972) 12

Macon v. *Lash*, 458 F.2d 932 (7th Cir. 1972) 5,6

Martinez v. *California*, 444 U.S. 277 (1980) 7, 10

Mullane v. *Central Hanover Bank and Trust Co.*, 339 U.S. 306 (1950) 4

Parratt v. *Taylor*, 101 S.Ct. 1908 (1981) 2, 3, 4, 5

Perry v. *Sindermann*, 408 U.S. 593 (1972) 8

Rodriguez v. *United States*, 395 U.S. 327 (1969) 5, 6

Vitek v. *Jones*, 445 U.S. 480 (1980) 7, 8, 9

Wolff v. *McDonnell*, 418 U.S. 539 (1974) 8

CONSTITUTIONS:

United States Constitution:

Fourteenth Amendment ..... *passim*

STATUTES:

28 U.S.C. § 1257 (2) 5

42 U.S.C. § 1983 5

Illinois Fair Employment Practices Act, Ill. Rev. Stat., ch. 48, § 851 *et seq.* (1979) (currently the Illinois Human Rights Act, Ill. Rev. Stat., ch. 68, § 1-101 *et seq.*, effective July 1, 1980) ..... *passim*

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I. The Procedures Of The Fair Employment Practices Act Deny Mr. Logan The Due Process Guaranteed By The Fourteenth Amendment.

The State of Illinois created, through the Fair Employment Practices Act (the "FEPA"), a set of procedures whereby an individual can seek redress for employment discrimination. According to the provisions of the FEPA, Mr. Logan had every reason to expect that the Fair Employment Practices Commission (the "Commission") would determine whether his claim was meritorious and whether he should be awarded reinstatement, back pay and other relief. Instead, Mr. Logan's action was automatically dismissed due to the failure of the Commission's Investigator to schedule a fact finding conference within 120 days of the filing of the charge. To automatically dismiss Mr. Logan's claim — with no consideration of its merits — is to deny him the due process guaranteed him by the Fourteenth Amendment.

In this case, due process requires that a conscious and intentional decision be made based on the merits of Mr. Lo-

gan's claim or the conduct of the parties. The Company in its Supplemental Brief does not contest that Mr. Logan complied with all his statutory obligations. Supplemental Brief for Appellee at 2. Moreover, the Company has never asserted that the termination of Mr. Logan's claim was the result of a decision by the Commission on the merits of his claim. Even the Attorney General of Illinois writing on behalf of the Human Rights Commission (successor to the Fair Employment Practices Commission) states that Mr. Logan's claim was terminated "through no fault of his own and without any consideration of the merits." Brief of Illinois Human Rights Commission at 2.

At a minimum, due process requires that Mr. Logan should have received prior notice. Proper notice could have informed him that his claim was in jeopardy of automatic termination if the Commission failed to schedule a fact finding conference within 120 days. It should also have apprised him of procedures which he could take to avoid this loss. Brief for Appellant at 16.

The Company's response to these contentions in its Supplemental Brief centers on *Parratt* v. *Taylor,* 101 S.Ct. 1908 (1981). In *Parratt,* this Court decided that a prison inmate who lost his hobby kit as a result of the negligence of a prison employee was not denied due process since he had an adequate state remedy. The Court, however, was careful to set out the circumstances which must exist before any analysis is made of the adequacy of alternative state remedies.

First, the Court found that "the loss is not the result of some established state procedure." *Id.* at 1915-1916. In *Parratt,* the hobby kit was lost because the prison employee did not follow the proper procedures for handling prisoners' property. Here, at first blush, the same thing appears to have happened. The investigator misread her calendar and scheduled the fact finding conference five days later than the state procedure provided.

But the loss here did not actually occur until the Illinois Supreme Court decided that the consequence would be that Mr. Logan would lose his case. The proper comparison to *Parratt* is that here the negligence caused only the loss of a timely fact finding conference. But Mr. Logan does not assert that he was denied due process by not having a timely fact finding conference. The due process violation is that he has lost his case because of the negligent failure to hold the fact finding conference on time, not because of a decision on the merits after notice and an opportunity to be heard. It was an established state procedure as decided by the Illinois Supreme Court which determined the consequence for the negligent conduct by the state investigator. And it is this procedure, the "automatic" termination, Supplemental Brief for Appellee at 15, which violates due process. In fact, Mr. Logan challenges the FEPA specifically because it makes negligent conduct by state employees a state procedure for disposing of employment discrimination charges.[1]

Second, the Court found that "it is not only impractical but impossible to provide a meaningful hearing before deprivation." 101 S.Ct. at 1916. In *Parratt*, there was no way to provide due process before the final loss of the hobby kit occurred. Once the kit was lost, all that could be provided was com-

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[1] In *Parratt*, the Court quoted the panel opinion in *Bonner* v. *Coughlin*, 517 F.2d 1311 (7th Cir. 1975) (Stevens, J.), *modified en banc*, 545 F.2d 565 (1976), *cert. denied*, 435 U.S. 932 (1978) and adopted its distinction between cases that concern the adequacy of established state procedures and those that concern property damage due to official misconduct:

> It seems to us that there is an important difference between a challenge to an established state procedure as lacking in due process and a property damage claim arising out of the misconduct of state officers. In the former situation the facts satisfy the most literal reading of the Fourteenth Amendment's prohibition against "State" deprivations of property. 517 F.2d at 1319, 101 S.Ct. at 1916. Because *Bonner* was an isolated act of negligence by a state employee, the court then inquired about the existence of adequate state remedies. *See Kimbrough* v. *O'Neil*, 523 F.2d 1057, 1066 (7th Cir. 1975) (Stevens, J., concurring) *aff'd en banc*, 545 F.2d 1059 (1976).

pensation. Here, however, the deprivation is the loss of Mr. Logan's employment discrimination action due to the Illinois Supreme Court's construction of a statutory deadline. To be sure, no fact finding conference can ever again be scheduled within 120 days from the time Mr. Logan filed his charge. But the consequence of the negligent failure to convene the fact finding conference can still be examined and reversed. Mr. Logan can still be given a hearing and a decision on his employment discrimination charge. The deprivation will never finally occur if this Court reverses the Illinois Supreme Court and permits Mr. Logan's charge to be decided.

Unlike *Parratt* and the cases on which it relied, here there is no "impracticality of providing any meaningful predeprivation process" which leads the court to inquire as to "the availability of some meaningful means by which to assess the propriety of the State's action at some time after the initial taking." *Id.* at 1915. The instant case is similar to *Mullane* v. *Central Hanover Bank and Trust Co.*, 339 U.S. 306 (1950), where this Court was asked not to compensate a due process deprivation, but rather to reverse a state supreme court's decision that would otherwise have cut off the rights of persons with legal claims without affording them notice and other due process protections. In *Mullane*, this Court reversed the New York Court of Appeals and imposed proper safeguards for the adjudication of the potential claims against the common trust. *See Armstrong* v. *Manzo*, 380 U.S. 545 (1965) (where the Court reversed the Texas Supreme Court's affirmance of an adoption decree, because the divorced father was not afforded sufficient notice and opportunity to appear).

In cases like *Mullane*, *Armstrong*, and this one, a reviewing court need not search for alternative remedies, as this Court had to do in *Parratt*. Instead, all that must be examined is the adequacy of the established state procedure in light of due process requirements. If the procedures are inadequate, this Court should reverse and remand for a new adjudication with adequate procedures. To say that reversal in this case is the exercise of "supervisory jurisdiction over state courts," Sup-

plementary Brief for Appellee at 7, is to ignore the duty of this Court to pass on the constitutionality of state procedures in the very case in which the procedures were applied, as this Court ordinarily does in the exercise of its jurisdiction pursuant to 28 U.S.C. § 1257(2).

Parratt is distinguishable on other grounds as well. *Parratt* involved a loss that might easily be characterized as *De minimis;* at stake in this case is two years of back pay which may be as high as $15,000 at this time, restoration of employment with the Company, and other relief provided by the FEPA. Brief for Appellant at 39-40.

Parratt was brought under 42 U.S.C. § 1983, and the Court was concerned about extending a federal remedy to "every alleged injury which may have been inflicted by a state official acting under 'color of law'. . . ." *Id.* at 1917. Here Mr. Logan chose to bring his charge in a state administrative tribunal; he asserts no claim under 42 U.S.C. § 1983. The state tribunal, represented by the Attorney General of Illinois, supports Mr. Logan's position. The Company castigates Mr. Logan for "choosing" this forum. Supplemental Brief for Appellee at 6. In fact, it is the Company that chose the judicial forum, by beginning an original action in the Illinois Supreme Court asking for a writ of prohibition. Curiously, in its anxiety to avoid defending in the state tribunal, the Company argues that Mr. Logan may have a remedy under § 1983 for deprivation of his charge without due process if this Court rejects his appeal and no alternative state remedy exists. Thus, the Company's argument would expand § 1983 liability.

Finally, unlike *Parratt,* this case involves an adjudication, not random or accidental damage to property. In the context of a criminal case, this Court overturned a court rule which barred an untimely appeal filed by the defendant himself because his retained counsel had not filed a timely appeal. *Rodriquez* v. *United States,* 395 U.S. 327 (1969). Similarly, in *Macon* v. *Lash,* 458 F.2d 942 (7th Cir. 1972) (Stevens, J.), the statutory right to a criminal appeal was foreclosed because a court-appointed attorney, through inexperience, failed to per-

fect the appeal correctly. The court held that such a result violated the Fourteenth Amendment and ordered that the petitioner be permitted to prosecute his appeal. The court in *Macon* relied on *Lane* v. *Brown*, 372 U.S. 477 (1963), where the petitioner's appeal rights had been by the decision of the state public defender not to take an appeal. The *Lane* Court ruled that the petitioner should be provided a new appeal to the state supreme court. In these cases, the courts found that the right to pursue an appeal (a right that was merely statutory, not constitutional) could not be cut off under state procedures that enabled persons other than the petitioner to cause the cut-off, either by negligence or conscious decision. In certain respects, the instant case presents a more obvious deprivation of due process than these cases. Here, the person whose conduct first led to the cutting off of Mr. Logan's right to pursue his case is in no sense his agent. Moreover, in the instant case the procedure is being attacked within the adjudication itself, not in a collateral proceeding. *Rodriguez*, *Macon* and *Lane* were all habeas corpus proceedings. *See Lane*, 372 U.S. at 484.

II. Mr. Logan's Action Under The FEPA Is A Property Interest Which Must Be Protected By Procedures Complying With Due Process Requirements.

The FEPA creates an interest protected by due process. This interest arises under the FEPA because victims of employment discrimination are entitled to relief when they can show that they have been discriminated against by their employers. *See infra;* Brief for Appellant at 28-30; Brief of Illinois Human Rights Commission at 3-6. Mr. Logan's action qualifies as property because of his objective expectation firmly fixed in state law (the FEPA) that he will be granted relief upon a showing that his employer discriminated against him. Moreover, state law provides expressly for judicial review of the Commission's decision. Having created this protected interest, the state cannot terminate a charge without using procedures that satisfy due process. The Company mischaracterizes the opinions of this Court when it argues that Mr. Lo-

gan's employment discrimination action is conditioned on the procedures set forth in the FEPA as they have been interpreted by the Illinois Supreme Court. Supplemental Brief for Appellee at 16-17. The Company's argument has been expressly rejected by this Court in *Arnett* v. *Kennedy*, 416 U.S. 134 (1974) and *Vitek* v. *Jones*, 445 U.S. 480 (1980). A state created entitlement cannot constitutionally be limited by procedures that violate due process.

The Company relies on *Martinez* v. *California* to support its position. 444 U.S. 277 (1980). *Martinez*, however, is irrelevant to this issue. There the Court held that a state statute which provides a defense of absolute immunity for parole officers from a wrongful death action did not violate substantive due process. Absolute immunity was found not to be wholly arbitrary and irrational. In the process of deciding the case, this Court first assumed that there was a state created property interest and then indicated that the property interest in a cause of action is defined not only by the elements of the action but also by the defenses provided at state law. The Company implies that footnote 5 in *Martinez*, *id.* at 282, undercuts *Arnett* v. *Kennedy* and establishes that state entitlements are subject to whatever procedures the state provides, even if those procedures do not meet the procedural requirements of due process. The Company applies its argument to Mr. Logan's case and concludes that the procedure provided by the state here, the termination of Mr. Logan's action because of the negligence of the investigator, is all that due process requires. But the Company is wrong in its analysis.

First *Arnett* is still good law as was shown by *Vitek* v. *Jones*, decided two months after *Martinez*. In *Vitek*, a Nebraska statute permitted prison officials to transfer prisoners to mental hospitals. The only statutory requirement for a transfer was the determination by a physician or psychologist that the inmate was suffering from a mental disease or defect which could not be properly treated in the prison. 445 U.S. at 483. The Court held that because the statutory arrangement did not provide for transfers at will but only when prisoners

met the statutory tests, an entitlement was created which was protected by due process.

> "[T]he minimum requirements of procedural process appropriate for the circumstances must be observed." *Wolff* v. *McDonnell*, [418 U.S. 539 (1974)] at 558. These minimum requirements being a matter of federal law, they are not diminished by the fact that the State may have specified its own procedures that it may deem adequate for determining the preconditions to adverse official action.

Id. at 491. In reaching this position the Court relied on *Arnett* and quoted the following language from Justice Powell's opinion.

> The plurality opinion evidently reasons that the nature of appellee's interest in continued federal employment is necessarily defined and limited by the statutory procedures for discharge and that the constitutional guarantee of procedural due process accords to appellee no procedural protections against arbitrary or erroneous discharge other than those expressly provided in the statute. The plurality would thus conclude that the statute governing federal employment determines not only the nature of appellee's property interest, but also the extent of the procedural protections to which he may lay claim. It seems to me that this approach is incompatible with the principles laid down in *Roth* and *Sindermann*. Indeed, it would lead directly to the conclusion that whatever the nature of an individual's statutorily created property interest, deprivation of that interest could be accomplished without notice or a hearing at any time. This view misconceives the origin of the right to procedural due process. That right is conferred, not by legislative grace, but by constitutional guarantee. While the legislature may elect not to confer a property interest in federal employment, it may not constitutionally authorize the deprivation of such an interest, once conferred, without appropriate procedural safeguards. As our cases have consistently recognized, the adequacy of statutory procedures for deprivation of a statutorily created property interest must be analyzed in constitutional terms. *Goldberg* v. *Kelly*, 397 U.S. 254 (1970); *Bell* v. *Burson*, 402 U.S. 535 (1971); *Board of Regents* v. *Roth*, [408 U.S. 564 (1972)]; *Perry* v. *Sindermann*, [408 U.S. 593 (1972)].

Arnett v. *Kennedy*, 416 U.S. at 166-167, quoted at 445 U.S. at 490, n.6. The importance of this Court's rulings in *Arnett* and *Vitek* cannot be given enough emphasis. To approve the Company's view would effectively destroy the Fourteenth Amendment's due process clause. The due process clause would become a mere shell, protecting individuals from deprivations of state created entitlements only when the state itself adopts the procedures required by the due process clause. While the state may choose not to confer a property interest "it may not constitutionally authorize the deprivation of such an interest, once conferred, without appropriate procedural safeguards." *Id.*

The FEPA provides that "equal employment opportunity . . . without discrimination because of . . . physical or mental handicap unrelated to ability . . . shall be protected by State law." § 851 (J.A. 37). It provides that it is an "unfair employment practice: (a) For any employer, because of . . . physical or mental handicap unrelated to ability of an individual, . . . to discriminate against such individual with respect to hire, . . . tenure, terms or conditions of employment . . ." § 853 (J.A. 39). And it provides that, "When all the testimony has been taken, the Commissioner or Adjudicator shall determine whether the respondent has engaged in or is engaging in the unfair employment practice with respect to the person aggrieved as charged in the complaint," and award an order to cease the discrimination, back pay and other relief. § 858.01(c) (J.A. 48).

Like the statute at issue in *Vitek*, the statute here establishes a standard for governmental action, one that creates an "objective expectation, firmly fixed in state law," 445 U.S. at 489, that discrimination is outlawed and that a victim of discrimination can obtain justice from the Commission in the form of injunctive relief and back pay. Having created this expectation, the state cannot destroy it by terminating charges on the basis of an investigator's scheduling error. Rather, charges can only be terminated upon notice and a decision on the case.

Secondly, footnote 5 of *Martinez*, when properly read, does not permit the state to establish whatever procedures it wants. The language of the footnote shows that the state can define the elements of a cause of action and the defenses.

> 5. It is arguable, however, that the immunity defense, like an element of the tort claim itself, is merely one aspect of the State's definition of that property interest. Recently, in considering a lawyer's claim of immunity in a state malpractice action, we noted that "when state law creates a cause of action, the State is free to define the defenses to that claim, including the defense of immunity, unless, of course, the state rule is in conflict with federal law." *Ferri* v. *Ackerman*, [444 U.S. 193] at 198 [(1979)].

444 U.S. at 282. The Court does not suggest that having defined the property interest the state can then provide procedures which do not meet the procedural requirements for due process. In Mr. Logan's case the State of Illinois has set forth the elements of a cause of action for employment discrimination and has given the employer certain defenses as well. In this appeal, Mr. Logan does not contest the substantive law of employment discrimination in Illinois. Rather it is the procedures which he argues fall short of due process requirements, that is, the termination of his claim by reason of the failure to convene a timely fact finding conference and not by a decision based on the merits of his case. Footnote 5 in *Martinez* simply does not address the question of whether the state can provide whatever procedures it wants.

III. Dismissal Of Mr. Logan's Charge Because Of The Failure Of The Commission's Investigator To Convene A Timely Fact Finding Conference Is Wholly Arbitrary And Irrational, And Therefore Violates Due Process.

The Company in its Supplemental Brief, does not dispute Mr. Logan's reading of *Martinez* v. *California* that, assuming there is a property interest in a cause of action, the state procedure and defenses to the cause of action must not be "wholly arbitrary and irrational." *Martinez* at 282. In his initial brief,

Mr. Logan established that the termination of his rights meets this standard and therefore his due process rights were violated. Brief for Appellant at 26.

The irrationality of terminating Mr. Logan's action as the Illinois Supreme Court did, is that he lost without any consideration of whether he should have lost. Although it was the Commission's investigator who failed to convene the conference on time, Mr. Logan was arbitrarily chosen as the one who bears the full brunt of her negligent violation of the statutory requirements. The remedy employed here is a wholly arbitrary and irrational way to compel the Commission's investigator to hold a fact finding conference on time. There is no incentive for the investigator to alter her behavior or for the Commission to monitor its employees to assure compliance with statutory deadlines.

While the Illinois authorities rather than this Court are responsible for finding a non-arbitrary way to have fact finding conferences convened on time, one rational solution would be to fine or discipline this investigator and others who fail to meet their statutory obligations. The burden would then be placed on the investigator, where it belongs, rather than on an innocent private party.

The Company fundamentally mischaracterizes the nature of the relationship between the charging party and the Commission in an employment discrimination proceeding brought under the FEPA. The Company incorrectly describes the Commission as acting as an agent for the complaining party, or, alternatively, as a prosecutor protecting the interests of the State of Illinois. The Company uses this mischaracterization to argue that it is reasonable to make the complainant suffer the consequences of the Investigator's statutory violation. Supplemental Brief for Appellee at 14-15. In truth, the Commission's role is like a trier of fact. At each stage of the process of adjudicating charges of employment discrimination, the Commission makes determinations on the merits of the case. *See* Brief for Appellant at 28-29.

IV. Termination Of Mr. Logan's Employment Discrimination Claim Violates Equal Protection.

Termination of Mr. Logan's employment discrimination charge because the investigator convened the fact finding conference late also violates equal protection, because it is the application of an irrational governmental classification. In the Brief for Appellant, Mr. Logan demonstrated that blanket dismissal of all such charges does not rationally serve any governmental purpose. In its Supplemental Brief, the Company concedes that the dismissal does not serve to eliminate unfounded charges, Supplemental Brief for Appellee at 18, and fails to identify any purpose the dismissal does serve.

The Company advances just two arguments. First, it contends that the statute at issue does not "create a class of claimants whose conferences are not timely convened, because its express mandate is that such conferences be convened." Supplemental Brief for Appellee at 18. Mr. Logan's quarrel, of course, is with the Statute as interpreted by the Illinois Supreme Court. This interpretation, as the Company forthrightly concedes, "not only allows but *requires* 'automatic dismissal' of FEPA charges. . . ." Supplemental Brief for Appellee at 15 (emphasis in original). Second, the Company says that the 120 day requirement is like a statute of limitations, but ignores the critical distinctions that Mr. Logan has already pointed out. Brief for Appellant at 26, 47.

Like the double-bond requirement in *Lindsey* v. *Normet,* 405 U.S. 56 (1972), the statute here has the effect of dividing persons with equivalent legal claims into two categories. In *Lindsey,* those in the disfavored category, forcible entry and detainer appellants, were subject to a special burden for no good reason. In the instant case, persons in the disfavored category suffer complete loss of their claims for no reason at all. An irrational harm is visited on one category of legal claimants.

A charging party, just like an employer, has an interest in the speedy adjudication of an employment discrimination

charge If the Illinois statute had been interpreted by the Illinois Supreme Court to require that whenever a fact finding conference was not held in 120 days, the charging party would take judgment by default, the employer would certainly contend that its Fourteenth Amendment rights were violated. Nevertheless, to the extent that the rule that now exists serves any purpose, the proposed rule would serve just as well. And to the extent that one party should be penalized for delay that neither caused, it may as well be the employer as the charging party. Irrational dismissal of a legal claim without notice and decision is just as offensive as irrational imposition of liability without such safeguards. Both offend "raw justice," Supplemental Brief for Appellee at 13, and both offend the Fourteenth Amendment.

V. Conclusion

For the foregoing reasons, the judgment of the Illinois Supreme Court should be reversed.

Respectfully submitted,

GARY H. PALM
Gary H. Palm
Counsel for Appellant

GARY H. PALM
MARK C. WEBER
EDWIN F. MANDEL LEGAL AID CLINIC
UNIVERSITY OF CHICAGO LAW SCHOOL
6020 South University Avenue
Chicago, Illinois 60637
(312) 324-5181